

## Attachment 1

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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<b>In the Matter of</b>	)	
	)	<b>EB Docket No. 03-200</b>
<b>Section 272(d) Biennial Audit of</b>	)	
<b>Verizon Communications, Inc.</b>	)	

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**DECLARATION OF ROBERT M. BELL  
ON BEHALF OF AT&T CORP.**

1. My name is Robert M. Bell. My business address is AT&T Labs-Research, 180 Park Avenue, Florham Park, New Jersey 07932.
  
2. I received a Ph.D. in Statistics from Stanford University in 1980. From 1980 to 1998, I was promoted to Senior Statistician at RAND, a non-profit institution that conducts public policy analysis. While at RAND, I supervised the statistical design and/or analysis of many projects, including several large multi-site evaluations. I also headed the RAND Statistics Group from 1993 to 1995 and taught statistics in the RAND Graduate School from 1992 to 1998. In 1998, I joined the Statistics Research Department at AT&T Labs-Research, where I am a Principal Member of Technical Staff. My main research area is survey research methods. I have authored or co-authored fifty articles on statistical analysis that have appeared in a variety of refereed, professional journals. I am a fellow of the American Statistical Association. I am currently a member of the Committee on National Statistics organized by the National Academy of Sciences as well as the Academy's Panel to Review the 2000 Census. I have attached a copy of my curriculum vitae as Exhibit RMB-1.

3 I submitted a Declaration in the first Verizon Section 272 Audit proceeding, CC Docket No. 96-150, on April 8, 2002 and a Declaration in the first SBC Audit proceeding, CC Docket No. 96-150, on January 29, 2002.

4. The purpose of this declaration is to address the data on performance measurements in Attachment A as well as the studies relied upon by Verizon to justify the differentials shown by that data described in Appendix A:68-A:75.

**I. THE PERFORMANCE MEASUREMENT DATA SHOWS THAT VERIZON HAS DISCRIMINATED IN FAVOR OF ITS SECTION 272 AFFILIATE.**

5. The data in Attachment A show consistent and material discrimination in favor of the 272 affiliate over unaffiliated carriers for DS-1 service in New York and Massachusetts.

6. The average Firm Order Confirmation Response Time ("FOC") intervals for non-affiliated carriers were consistently and materially longer than for the 272 affiliate. Although it can be difficult to extrapolate from single month comparisons due to small sample sizes of affiliate orders, the monthly data show striking consistency. In New York, the non-affiliate average was longer in 21 of the 23 months where there were any affiliate orders (including one tie), usually by a factor of three or greater (Attachment A, pp. A-35 and A-36). In Massachusetts, the non-affiliate average was greater in each of the 12 months where there were affiliate orders (pp. A-15 and A-16).

7 Year long comparisons confirm that non-affiliates received far poorer service. For 2001 in New York, the average FOC interval for non-affiliates was 7.5 days (with

an estimated standard error ("SE") of 0.08)<sup>1</sup> versus only 2.1 days for section 272 affiliates (SE = 0.32). For 2002, averages were 3.3 days (SE = 0.03) versus 1.5 days (SE = 0.29). In Massachusetts, the averages were 7.9 days (SE = 0.15) versus 2.0 days (SE = 0.48) for 2001 and 1.6 days (SE = 0.02) versus 1.1 days (SE = 0.13) for 2002.

8. Results for "Average Installation Interval" followed a similar pattern for these two states. For New York, non-affiliates received poorer service in 22 of 23 comparisons (pp. A-37 and A-39). In 2001, the non-affiliates' average was 28.4 days (SE = 0.17) versus only 17.1 days (SE = 2.05) for affiliates. In 2002, the averages were 26.6 days (SE = 0.15) and 15.4 days (SE = 1.89), respectively.

9. For Massachusetts, the non-affiliate averages were longer in 7 of the 8 months where there were any affiliate orders (pp. A-17 and A-19). In 2001, the non-affiliates' average was more than twice that for affiliates: 33.4 days (SE = 0.36) versus 14.6 days (SE = 2.56). In 2002, the averages were 24.8 days (SE = 0.19) and 18.7 days (SE = 1.53), respectively.

10. Similarly, non-affiliates in New York and Massachusetts consistently received poorer service in terms of average repair times. In New York, non-affiliates had longer repair times for DS1 service in 21 of 23 comparisons (pp. A-41 and A-42).<sup>2</sup> For FG-D in Massachusetts, non-affiliates had longer repair times for 11 of 12 months in 2002 (no data were reported for this product in 2001, p. A-22). The non-affiliates' average was more than twice that

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<sup>1</sup> Discussed in my Declaration in the first Verizon Section 272 Audit proceeding, CC Docket No. 96-150 (April 8, 2002) at ¶ 41.

<sup>2</sup> From the extremely large standard deviations reported for DS1, it is clear that there is at least one outlier (very large repair time) in October 2001 (for non-affiliates) and in December 2002 (for affiliates). Consequently, reporting averages based on all 12 months would be misleading. Calculations based on the other 11 months for each year yield the following results. In 2001, the non-affiliates' average was 6.3 days (SE = 0.17) versus 5.2 days (SE = 1.37) for affiliates. In 2002, the averages were 6.9 (SE = 0.06) and 3.5 days (SE = 0.63), respectively.

for section 272 affiliates: 3.0 days (SE = 0.21) versus 1.4 days (SE = 0.11). Indeed, these data may well understate the true differential inasmuch as Verizon excluded “trouble” data that should have been included under the business rules Verizon used.<sup>3</sup>

11. The skewness (long tail) of the installation times and samples sizes make it inappropriate to try to do formal hypothesis testing without access to the raw data (e.g., to allow permutation testing). Nonetheless, comparisons of the non-affiliate/affiliate differences with the estimated standard errors for the individual averages make it clear that none of the differences in the preceding paragraphs were likely to have occurred by chance if installation/repair times for the two sets of customers were drawn from the same distribution.

## **II. THE STUDIES RELIED UPON TO JUSTIFY THESE DIFFERENTIALS ARE INCOMPLETE AND THEY DO NOT EXPLAIN THE OBSERVED DIFFERENTIALS.**

12. Verizon suggests a variety of theories to explain inferior service performance for DS1 (Appendix A:71-75). In each case, it argues that non-affiliate orders differed systematically from those of section 272 affiliates in a way that made them harder to process and would therefore have led to longer installation or repair times in the absence of discrimination. Verizon then leaves it to the reader to infer that the referenced differences in order characteristics completely explain the differential in service times.

13. However, the Verizon analyses are generally superficial and incomplete, omitting, for example, “like-to-like” comparisons that would shed light on whether Verizon handles comparable orders in a nondiscriminatory manner. In addition, each analysis is based on a limited set of months and states, with little justification for the choices made. For example, the lone reported like-to-like comparison is for a single month-state combination, July 2002 in New

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<sup>3</sup> Appendix A:77.

York (Appendix A:72). There is no way to know whether other comparisons might have come out very differently had data from other months/states been analyzed as well. Indeed, because this analysis was not performed by an independent auditor, we cannot be sure that other, conflicting results have not been suppressed.

**A. Installation**

14 Verizon presents data for July 2002 in two states showing that unaffiliated carriers requested due dates beyond the standard minimum provisioning date more frequently than the section 272 affiliates did. Furthermore, it states that Verizon adjusts provisioning delivery in response to the due dates requested by customers. These finding establish the two elements necessary to show that a simple comparison of overall average installation times for non-affiliates and affiliates may be biased by customer request date differences.

15. However, without empirical evidence about the size of the delay associated with requested due dates beyond the standard minimum, Verizon's analysis provides no evidence that this factor explains a substantial portion – much less all – of the large difference between the average installation times for non-affiliates versus affiliates. This question could have been addressed directly by comparing non-affiliate installation times with those for affiliates, restricted to orders where the customer did not request an extension to the due date. Inexplicably, Verizon failed to present results of that analysis even though the necessary data were demonstrably available once it had identified which orders had extended customer requested due dates.

**B. Installation and Repair**

16. Similarly, Verizon offered fiber versus copper as a partial explanation for the differential in average installation interval as well as the sole explanation for the differential in repair interval, but again failed to complete the analysis (Appendix A:73-75). First, it simply

asserted that provisioning and repair over copper lines take more time, without giving any empirical data on how much longer either activity takes. Second, Verizon again failed to analyze and report “like-to-like” comparisons. For example, because all special access installation requests by affiliates in 2002 were over fiber, it would have made sense to compare the average installation interval for affiliates to that for non-affiliate orders restricted to fiber. Verizon failed to do so. Consequently, there is no basis for assuming that fiber versus copper explains more than a trivial portion of either the differentials in average installation interval or those in repair times.

**C. The Studies Provide No Credible Evidence Regarding The Magnitude Of The Impact Of The Claimed Causes**

17. Given the deficiencies of its analyses, Verizon failed to provide credible evidence regarding how much of the observed differentials any particular claimed characteristic might explain. Furthermore, even to the extent that individual characteristics may explain fractions of the differentials for average installation interval, those effects would not be additive to the extent that orders with one of the characteristics are more likely to have one of the others (e.g., both copper lines and need for facility building). Consequently, Verizon has not demonstrated that the longer service times received by non-affiliates were due to differences in the characteristics of the orders

Robert M. Bell  
Robert M. Bell

Dated: this 7<sup>th</sup> day of FEBRUARY, 2004



## Exhibit RMB-1

## **ROBERT M. BELL**

### **EDUCATION**

Ph.D., Statistics, 1980, Stanford University  
M.S., Statistics, 1973, University of Chicago  
B.S., Mathematics, 1972, Harvey Mudd College

### **PROFESSIONAL EXPERIENCE**

1998-Present – Principal Member Technical Staff, Statistics Research Department, AT&T Labs - Research, Florham Park, NJ; 2003 AT&T Science and Technology Medal  
1991-1999 -- Senior Statistician, RAND, Santa Monica, California; Head, RAND Statistics Group (1993-1995); Member, RAND Graduate School Faculty (1991-1998)  
1988-1991 -- Statistician, Social Policy Department, RAND, Santa Monica, California  
1980-1988 -- Associate Statistician, Economics and Statistics Department, RAND, Santa Monica, California  
1975-1979 -- Teaching Assistant/Research Assistant, Department of Statistics, Stanford University  
1973-1975 -- Consultant and Mathematical Assistant, Economics Department, The RAND Corporation, (also intermittently during educational leave)

### **RESEARCH AREAS**

**Experimental Design and Survey Development.** Dr. Bell supervised statistical design of Project Alert, an experiment of drug abuse prevention in thirty California and Oregon junior high schools. This work has involved data collection and analysis for sample selection/assignment, development of a series of 30 page questionnaires, and design of sampling procedures for several secondary analyses.

**Data Analysis.** Dr. Bell supervised the main data analysis in Project ALERT. He previously supervised analysis of clinical data from the National Preventive Dentistry Demonstration Program, a study of school-based preventive treatments. Data from that study included one to five annual examinations of 30,000 children in 10 communities, over 10,000 replicate examinations, and 20,000 surveys.

**Statistical Methodology.** Dr. Bell's methodological interests include survey research methods, analysis of data from complex samples, record linkage methods, analysis of missing data, measurement and scaling, robust procedures, empirical Bayes estimation, and sample reuse methods.

## PROFESSIONAL ORGANIZATIONS/HONORS

Member, Committee on National Statistics, National Academy of Sciences, 2001-present.

Chair, Committee to Review the 2000 Decade Design of the Scientists and Engineers Statistical Data System (SESTAT), National Academy of Sciences, 2002.

Member, Panel to Review the 2000 Census, National Academy of Sciences, 1998-present.

Fellow, American Statistical Association, 1998.

Chair, American Statistical Association Subcommittee, Census Advisory Committee of Professional Associations, 1997-1998; Member, 1995-2000.

Member, Panel on Alternative Census Methodologies, National Academy of Sciences, 1995-1999.

Member, Committee on Minorities in Statistics, American Statistical Association, 1995-2000.

Member, Panel to Evaluate Alternative Census Methods, National Academy of Sciences, 1992-1994.

Visiting Lecturer for American Statistical Association, 1984-1986.

Program Chairman, Applied Statistics Workshop, Southern California Section of American Statistical Association, 1984.

Institute of Mathematical Statistics, since 1979.

American Statistical Association, since 1974.

## PUBLICATIONS

### Published Articles

"Bias Reduction in Standard Errors for Linear Regression with Multi-Stage Samples," *Survey Methodology*, Vol. 28, 2002, 169-181 (Bell and McCaffrey).

"School-Based Drug Prevention: Challenges in Designing and Analyzing Social Experiments," in *Public Policy and Statistics: Case Studies from RAND*, eds. S.C. Morton and J.E. Rolph, Springer-Verlag, New York, 2000.

"Appropriateness of the Decision to Transfer Nursing Facility Residents to the Hospital," *Journal of the American Geriatric Society*, Vol. 48, 2000, 154-163 (Saliba, Kington, Buchanan, Bell, et al.)

"A Clinically Detailed Risk Information System for Cost," *Health Care Financing Review*, Vol. 21, 2000, 1-27 (Carter, Bell Dubois, Goldberg, Keeler, McAlearney, Post, and Rumpel).

"Cross-Lagged Relationships among Adolescent Problem Drug Use, Delinquent Behavior, and Emotional Distress," *Journal of Drug Issues*, Vol., 30, 2000, 283-304 (Bui, Ellickson, and Bell).

"Adolescent Use of Illicit Drugs Other Than Marijuana: How Important is Social Bonding and for Which Ethnic Groups?" *Substance Use and Misuse*, Vol. 34, 1999, 317-346 (Ellickson, Collins, and Bell).

"Simultaneous Polydrug Use among Teens: Prevalence and Predictors," *Journal of Substance Use*, Vol. 10, 1999, 233-253 (Collins, Ellickson, and Bell).

"Physician Response to Prenatal Substance Exposure," *Maternal and Child Health Journal*, 1999, 29-38 (Zellman, Bell, Archie, DuPlessis, Hoube, and Miu).

"Underuse and Overuse of Diagnostic Testing for Coronary Artery Disease in Patients Presenting with New-Onset Chest Pain," *American Journal of Medicine*, 1999, 391-398, (Carlisle, Leape, Bickel, Bell, et al.).

"Underuse of Cardiac Procedures: Do Women, Ethnic Minorities, and the Uninsured Fail to Receive Needed Revascularization?," *Annals of Internal Medicine*, Vol. 130, 1999, 183-192 (Leape, Hilborne, Bell, Kamberg, and Brook).

"The Sexual Practices of Asian and Pacific Islander High School Students," *Journal of Adolescent Health*, Vol. 23, 1998, 221-231 (Schuster, Bell, Nakajima, and Kanouse).

"Does Early Drug Use Increase the Risk of Dropping out of High School?," *Journal of Drug Issues*, Vol. 28, 1998, 357-380 (Ellickson, Bui, Bell, and McGuigan).

"Impact of a High School Condom Availability Program on Sexual Attitudes and Behaviors," *Family Planning Perspectives*, Vol. 30, 1998, 67-72 & 88 (Schuster, Bell, Berry, and Kanouse).

"Analytic Versus Holistic Scoring of Science Performance Tasks," *Applied Measurement in Education*, Vol. 11, 1998, 121-137 (Klein, Stecher, Shavelson, McCaffrey, Ormseth, Bell, Comfort, and Othman).

"Influencing Physician Response to Prenatal Substance Exposure Through State Legislation and Work-Place Policies," *Addiction*, Vol. 92, 1997, 1123-1131 (Zellman, Jacobson, and Bell).

"Adjusting Cesarean Delivery Rates for Case Mix," *Health Services Research*, Vol. 32, 1997, 509-526. (Keeler, Park, Bell, Gifford, and Keesey).

"Students' Acquisition and Use of School Condoms in a High School Condom Availability Program," *Pediatrics*, Vol. 100, October 1997, 689-694 (Schuster, Bell, Berry, and Kanouse)

"Impact Of Response Options And Feedback About Response Inconsistencies On Alcohol Use Self-Reports By Microcomputer," *Journal of Alcohol and Drug Education*, Vol. 42, 1997, 1-18 (Hays, Bell, Gillogly, Hill, Giroux, Davis, Lewis, Damush, and Nicholas).

"Adjusting for Attrition in School-Based Samples: Bias, Precision, and Cost Trade-Offs of Three Methods," *Evaluation Review*, Vol. 21, October 1997, 554-567 (McGuigan, Ellickson, Hays, and Bell).

"Teenagers and Alcohol Misuse in the United States: By any Definition, it's a Big Problem," *Addiction*, Vol. 91, 1996, 1489-1506 (Ellickson, McGuigan, Adams, Bell, and Hays).

"Communication Between Adolescents and Physicians About Sexual Behavior and Risk Prevention," *Archives of Pediatrics and Adolescent Medicine*, Vol. 150, 1996, 906-913 (Schuster, Bell, Petersen, and Kanouse).

"The Sexual Practices of Adolescent Virgins: Genital Sexual Activities of High School Students Who Have Never Had Vaginal Intercourse," *American Journal of Public Health*, Vol. 86, 1996, 1570-1576 (Schuster, Bell, and Kanouse).

"How Will the NCAA's New Standards Affect Minority Student-Athletes?," *Chance*, Vol. 8, 18-21, Summer 1995 (Klein and Bell).

"Discussion of Census 2000: Statistical Issues in Reengineering the Decennial Census," *Proceedings of the Social Statistics Section, American Statistical Association*, 1995, 17-18 (Bell).

"Effects of Reporting Methods on Infant Mortality Rate Estimates for Racial and Ethnic Subgroups," *Journal of Health Care for the Poor and Underserved*, Vol. 6, 1995, 60-75 (Farley, Richards, and Bell).

"Do Response Options Influence Self-Reports of Alcohol Use?," *The International Journal of the Addictions*, Vol. 29, 1994, 1909-1920 (Hays, Bell, Damush, Hill, DiMatteo, and Marshall).

"The Utility of Multiple Raters and Tasks in Science Performance Assessments," *Educational Assessment*, Vol. 2, 1994, 257-272 (Saner, Klein, Bell, and Comfort).

"Sampling and Statistical Estimation in the Decennial Census," *Proceedings of the Section on Survey Research Methods, American Statistical Association*, 1994, 71-79 (Bell).

"The Impact of Response Options and Location in a Microcomputer Interview on Drinking Drivers' Alcohol Use Self-Reports," *Alcohol and Alcoholism*, Vol. 29, 1994, 203-209 (Hays, Bell, Hill, Gillogly, Lewis, Marshall, Nicholas, and Marlatt).

"The Urge to Merge: Linking Vital Statistics Records and Medicaid Claims," *Medical Care*, Vol. 32, 1994, 1004-1018, reprinted by invitation in *Yearbook of Medical Informatics*, 1995, 366-380 (Bell, Keesey, and Richards).

"The 1966 Enactment of Medicare: Its Effect on Discharges from Los Angeles County-Operated Hospitals," *American Journal of Public Health*, Vol. 84, 1994, 1325-1327 (Glassman, Bell, and Tranquada).

"The Urge to Merge: A Computational Method for Linking Datasets with No Unique Identifier," *Proceedings of the 18th Annual SAS Users' Group International Conference, 1993* (Bell, Keesey, and Richards).

"Using Response Agreement to Evaluate Suspect Links on a Longitudinal Survey," *Proceedings of Section on Survey Research Methods, American Statistical Association*, 1993, 286-291 (Bell).

"Changing Adolescent Propensities to Use Drugs: Results from Project ALERT," *Health Education Quarterly*, Vol. 20, 1993, 227-242 (Ellickson, Bell, and Harrison).

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"Do Drug Prevention Effects Persist into High School? How Project ALERT Did with Ninth Graders," *Preventive Medicine*, Vol. 22, 1993, 463-483 (Bell, Ellickson, and Harrison).

"Preventing Adolescent Drug Use: Long Term Results of a Junior High Program," *American Journal of Public Health*, Vol. 83, 1993, 856-861 (Ellickson, Bell, and McGuigan).

"Stepping Through the Drug Use Sequence: Longitudinal Scalogram Analysis of Initiation and Regular Use," *Journal of Abnormal Psychology*, Vol. 101, 1992, 441-451 (Ellickson, Hays, and Bell).

"New DEALEs: Other Approximations of Life Expectancy," *Medical Decision Making*, Vol. 12, 1992, 307-311 (Keeler and Bell).

"A Microcomputer Assessment System (MAS) for Administering Computer-Based Surveys: Preliminary Results from Administration to Clients at an Impaired-Driver Treatment Program," *Behavior Research Methods, Instruments, & Computers*, Vol. 24, 1992, 358-365 (Hays, Gillogly, Hill, Lewis, Bell, and Nicholas).

"Challenges to Social Experiments: A Drug Prevention Example," *J Res in Crime and Delinquency*, Vol. 29, 1992, 79-101 (Ellickson and Bell).

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"Value Preferences for Nursing Home Outcomes," *The Gerontologist*, Vol. 26, 1986, 303-308 (Kane, Bell, and Riegler).

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"Effects of Affirmative Action in Medical Schools, a Study of the Class of 1975," *New England Journal of Medicine*, Vol. 313 (Special Article), 1985, 519-525 (Keith, Bell, Swanson, and Williams).

"The Cost and Effectiveness of School-Based Preventive Dental Care," *American Journal of Public Health*, Vol. 75, 1985, 382-391 (Klein, Bohannon, Bell, Disney, Foch, and Graves).

"Management and Evaluation of the Effects of Misclassification in a Controlled Clinical Trial," *Journal of Dental Research*, Vol. 63 (Special Issue), 1984, 731-734 (Bell and Klein).

"Predicting the Course of Nursing Home Patients: A Progress Report," *The Gerontologist*, Vol. 23, 1983, 200-206 (Kane, Bell, Riegler, Wilson, and Keeler).

"Assessing the Outcomes of Nursing-Home Patients," *Journal of Gerontology*, Vol. 38, 1983, 385-393 (Kane, Bell, Riegler, Wilson, and Kane).

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"Competitive Optimality of Logarithmic Investment," *Mathematics of Operations Research*, Vol. 5, 1980, 161-166 (Bell and Cover).

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*Measuring a Changing Nation: Modern Methods for the 2000 Census*, Panel to Evaluate Alternative Census Methodologies, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C., 1999.

*Preparing for the 2000 Census: Interim Report II*, Panel to Evaluate Alternative Census Methodologies, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C., 1997.

*Sampling in the 2000 Census: Interim Report I*, Panel to Evaluate Alternative Census Methodologies, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C., 1996.

*Counting People in the Information Age, Final Report*, Panel to Evaluate Alternative Census Methods, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C., 1994.

*A Census that Mirrors America, Interim Report*, Panel to Evaluate Alternative Census Methods, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C. 1993.

### **RAND Publications**

*The Sexual Practices of Asian and Pacific Islander High School Students*, RP-744, RAND, 1998 (Schuster, Bell, Nakajima, and Kanouse).

*Analysis of Data from Complex Surveys* (videorecording), Statistics Short Course Series, V-092, RAND, 1997 (McCaffrey and Bell).



*Graphical Methods for Data Analysis*, (videorecording), Statistics Short Course Series, V-022 through V-025, RAND 1996 (Bell and McCaffrey).

*Defining Infants' Race and Ethnicity in a Study of Very Low Birthweight Infants*, MR-191-AHCPR, RAND, 1993 (Farley, Richards, and Bell).

*Do Teens Tell the Truth? The Validity of Self-Reported Tobacco Use in Adolescents*, N-3291-CHF, RAND, July 1991 (Freier, Bell, and Ellickson).

*How Accurate Are Adolescent Reports of Drug Use?*, N-3189-CHF, RAND, May 1991 (Reinisch, Bell, and Ellickson).

*Multiplying Inequalities, The Effects of Race, Social Class, and Tracking on Opportunities to Learn Mathematics and Science*, R-3928-NSF, RAND, July 1990 (Oakes, Ormseth, Bell, and Camp).

*Baseline Nonresponse in Project ALERT: Does it Matter?*, N-2933-CHF, The RAND Corporation, Santa Monica, California, April 1990 (Bell, Gareleck, and Ellickson).

*Prospects for Preventing Drug Use Among Young Adolescents*, R-3896-CHF, The RAND Corporation, Santa Monica, California, March 1990 (Ellickson and Bell).

*The Role of Professional Background, Case Characteristics, and Protective Agency Response in Mandated Child Abuse Reporting*, R-3825-HHS, The RAND Corporation, Santa Monica, California, January 1990 (Zellman and Bell).

*Results from the Evaluation of the Massachusetts Nursing Home Connection Program*, JR-01, The RAND Corporation, Santa Monica, California, October 1989 (Buchanan, Kane, Garrard, Bell, Witsberger, Rosenfeld, Skay, and Gifford).

*A Matched Sampling Algorithm for the Nursing Home Connection Demonstration*, N-2823-HCFA, The RAND Corporation, Santa Monica, California, July 1989 (Buchanan, Bell, Witsberger, Kane, Garrard, Rosenfeld, and McDermott).

*Provider Visit Patterns to Nursing Home Patients*, N-2824-HCFA, The RAND Corporation, Santa Monica, California, June 1989 (Buchanan, Witsberger, Bell, Kane, Garrard, and Rosenfeld).

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*Designing and Implementing Project ALERT, A Smoking and Drug Prevention Experiment*, R-3754-CHF, The RAND Corporation, Santa Monica, California, December 1988 (Ellickson, Bell, Thomas, Robyn, and Zellman).

*Assessing the Outcome of Affirmative Action in Medical Schools, A Study of the Class of 1975*, R-3481-CWF, The RAND Corporation, Santa Monica, California, August 1987 (Keith, Bell, and Williams).

*The Cost and Effectiveness of School-Based Preventive Dental Care*, R-3203-RWJ, The RAND Corporation, Santa Monica, California, April 1985 (Klein, Bohannon, Bell, Disney, Foch, and Graves).

*The Dynamic Retention Model*, N-2141-MIL, The RAND Corporation, Santa Monica, California, April 1985 (Fernandez, Gotz, and Bell).

*The Reliability of Clinical and Radiographic Examinations in the National Preventive Dentistry Demonstration Program*, R-3138-RWJ, The RAND Corporation, Santa Monica, California, June 1984 (Klein, Bell, Bohannon, Disney, and Wilson).

*Treatment Effects in the National Preventive Dentistry Demonstration Program*, R-3072-RWJ, The RAND Corporation, Santa Monica, California, February 1984 (Bell, Klein, Bohannon, Disney, Graves, and Madison).

*Outcome-Based Reimbursement for Nursing-Home Care*, R-3092-NCHSR, The RAND Corporation, Santa Monica, California, December 1983 (Kane, Bell, Hosek, Riegler, and Kane).

*The Military Application Process: What Happens and Can it be Improved?*, R-2986-MRAL, The RAND Corporation, Santa Monica, California May 1983 (Berryman, Bell, and Lisowski).

*Predicting the Course of Nursing Home Patients: A Progress Report*, N-1786-NCHSR, The RAND Corporation, Santa Monica, California, January 1982 (Kane, Riegler, Bell, Potter, and Koshland).

*Results of Baseline Dental Examinations in the National Preventive Dentistry Demonstration Program*, R-2862-RWJ, The RAND Corporation, Santa Monica, California, April 1982 (Bell, Klein, Bohannon, Graves, and Disney).

*CETA. Is it Equitable to Women?*, N-1683-DOL, The RAND Corporation, Santa Monica, California, May 1981 (Berryman, Chow, and Bell).

*Plan for the Analysis of Dental Examination Data in the National Preventive Dentistry Demonstration Program*, N-1658-RWJ, The RAND Corporation, Santa Monica, California, April 1981 (Klein and Bell).

*Medical School and Physician Performance: Predicting Scores on the American Board of Internal Medicine Written Examination*, R-1723-HEW, The RAND Corporation, Santa Monica, CA, August 1977 (Bell).

R. M. Bell/10

**February 2004**

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## Attachment 2

BELL ATLANTIC SCHEDULE OF STANDARD MINIMUM INTERVALS

1.0 - GENERAL

The intervals listed in the following tables depict the minimum number of business days required to provide Special Access Services as specified in the FCC tariffs. These intervals will also apply to the same services provided for the corridor service. Services or quantities without specific listing in the table or jointly provided with another telephone company, will be provided with negotiated Intervals as set forth in section 5 of FCC Tariff No. 1 and FCC Tariff No. 11.

Definitions of the Provisioning Critical Dates listed in the table are as follows.

- **Application Date (APP)** The date the customer provides a firm commitment and a quality ASR with sufficient and accurate information on the ASR, as detailed in Section 5 of FCC Tariff No 1 and FCC Tariff No 11. This is the order date and is considered day number zero in the overall interval.
- **Service Date (DD)** The date on which the service is to be made available to the customer. This is sometimes referred to as the Due Date.

## STANDARD MINIMUM INTERVAL TABLE

## 1 10 - SPECIAL ACCESS SERVICES (See Notes)

TYPE OF SERVICE	LINES/CIRCUITS QUANTITIES	TOTAL SERVICE INTERVAL ( Business Days)
<u>Voice Grade Services</u>	1 - 24	9
	25+	Negotiated*
<u>WATS Access Services</u>	1 - 24	9
	25+	Negotiated*
<u>Digital Data Services</u>	1 - 24	9
	25+	Negotiated*
Note 1 - No day zero due date orders will be accepted		
Note 2 - The Date Due will be confirmed subject to an availability of necessary facilities Where Facilities do not exist, an interval will be negotiated.		

\* Provided under Negotiated Interval as set forth in Section 5 of FCC Tariff No 1 and FCC Tariff No 11

## STANDARD MINIMUM INTERVAL TABLE

## 1.20 – HIGH CAPACITY SPECIAL ACCESS SERVICES (See Notes)

TYPE OF SERVICE	LINES/CIRCUITS QUANTITIES	TOTAL SERVICE INTERVAL ( Business Days)
<u>High Capacity DS1</u> (Includes Point to Point and Mux Systems)	1 - 8	9
	9 +	Negotiated*
<u>High Capacity DS3</u> (Includes Point to Point and Mux Systems)	1 - 4	20
	5 +	Negotiated*
<p>Note 1 - No day zero due date orders will be accepted</p> <p>Note 2 - The Due Date will be confirmed subject to an availability of necessary facilities. Where Facilities do not exist, then an interval will be negotiated</p> <p>Note 3 - These intervals will include Wireless Services where the Buildings and Sites already exists. If this is a new Site and /or no Building exists, then the Site Survey Process must be followed and the interval will be negotiated</p> <p>Note 4 - The DS1 Interval includes a three (3) day facility check, this will ensure the date that is provided on the FOC will be as reliable as possible</p> <p>Note 5 - The DS3 Interval includes a five (5) day facility check, this will ensure the date that is provided on the FOC will be as reliable as possible</p> <p>Note 6 - In the near future, Bell Atlantic will be developing expedite charges that will apply for service requests less than the standard interval.</p>		

\* Provided under Negotiated Interval as set forth in Section 5 of FCC Tariff No. 1 and FCC Tariff No. 11

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of February, 2004, I caused true and correct copies of the forgoing Comments of AT&T Corp. to be served on all parties by mailing, postage prepaid to their addresses listed on the attached service list.

Dated: February 10, 2004

/s/ Karen Kotula  
Karen Kotula



## **SERVICE LIST**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room CY-B402  
Washington, D.C. 20554\*

Qualex International  
Portals II  
445 12<sup>th</sup> Street, SW, Room CY-B402  
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Joseph DiBella  
VERIZON  
1515 N. Courthouse Rd., Suite 500  
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